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02 SEP 18 AM 10:55  
JAMES C. LAMBERT, JR.  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA

IN RE:

David Eugene Robinson,

Debtor(s)

CASE NO: 02-06145-W  
CHAPTER 13

TO: All Creditors and Parties in Interest

**MOTION AND MEMORANDUM IN SUPPORT OF MOTION TO SELL  
PROPERTY FREE AND CLEAR OF LIENS**

YOU ARE HEREBY NOTIFIED that the Debtor(s) propose(s) to sell the property herein described free and clear of all liens and encumbrances according to the terms and conditions stated below.

TYPE OF SALE: Private

PROPERTY TO BE SOLD: 1996 Nomad 26' pull-behind camper

PRICE: \$4000.00 (the value listed on schedule b was debtor's estimate, the camper has since been damaged and the \$4000.00 is the highest amount the debtor has been offered.)

APPRAISAL VALUE: No appraisal done

BUYER: Rick S. Murray

SALES AGENT: None

COMPENSATION TO SALES AGENT/AUCTIONEER/BROKER/ETC: N/A

ESTIMATED TRUSTEE'S COMPENSATION: N/A

LIENS/MORTGAGES/SECURITY INTERESTS ENCUMBERING PROPERTY: None

COSTS OF CLOSING: N/A

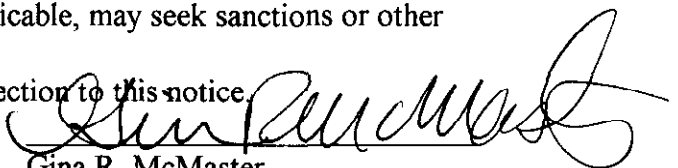
DEBTOR'S EXEMPTION: None

PROCEEDS ESTIMATED TO BE PAID TO THE ESTATE: None (debtor moves to be entitled to keep the proceeds from the sale of the camper to pay \$2000.00 that debtor was ordered by Family Court to pay ex-wife post-petition and to pay the attorney that represented him in divorce \$800.00. The debtor also moves to be entitled to keep the remaining funds for personal use since his creditors are being paid the equity in this camper through his chapter 13 plan.)

Any party objecting to the sale must do so in writing and in accordance with SC LBR 9014-1; any such objections will be heard at the date, time and place set forth in the Notice of Motion/Application and Opportunity for Hearing attached hereto. All objections should be filed with the Clerk of Court at 1100 Laurel Street, Post Office Box 1448, Columbia, SC 29202, with a copy served on the attorney of record, the trustee, or the debtor in possession, as applicable, at the address shown below. A copy of such objection should also be served on the United States Trustee of 1201 Main Street, Suite 2440, Columbia, SC 29201.

The court may consider additional offers at the scheduled hearing. The court may order at this hearing that the property be sold to another party on equivalent or more favorable terms.

The trustee or debtor in possession, as applicable, may seek sanctions or other similar relief against any party filing a spurious objection to this notice.



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Dated 9/16/02